



UTAH MUNICIPAL POWER AGENCY

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December 1, 2017

Mr. Rodney Bailey, Power Marketing Advisor
Western Area Power Administration
299 South Main Street, Suite 200
Salt Lake City, Utah 84111

Via email: SPP-Comments@wapa.gov

Dear Mr. Bailey:

Utah Municipal Power Agency (UMPA) appreciates the opportunity to submit these comments below and respectfully request that Western Area Power Administration (WAPA) accept them past the stated deadline of November 27.

WRP and CDP: If Colorado River Storage Project (CRSP) becomes a member of the Southwest Power Pool (SPP) and transfers functional control of Colorado River Colorado Missouri (CRCM) transmission to SPP, UMPA is concerned with how Western Replacement Power (WRP) and Customer Displacement Power (CDP) will be managed for the Firm Electric Service (FES) customers in Utah. As WAPA has stated throughout this process, one of the major goals is to keep their FES customers whole, in other words, no negative impact occurs if CRSP becomes a member of SPP.

UMPA utilizes the WRP and CDP options on a regular basis to serve its member loads and plans to continue using those options. CRSP has done an excellent job keeping its FES customers informed throughout this entire process and UMPA requests that such transparency continues with the WRP and CDP discussions.

Contract 2436: Based on several meetings held by WAPA and its FES customers in Utah regarding the MWTG process, UMPA is not aware of any issues or concerns impacting the Contract 2436 between PacifiCorp and WAPA. However, it is important that WAPA continues to protect the rights and interests provided in the contract as negotiations continue to possible SPP membership.

Commitment to Customers: Throughout this process, WAPA has repeatedly stated that there would be no change or negative impact to FES customers in Utah regarding CRSP billing and deliveries. UMPA appreciates those efforts and encourages WAPA to continue with that commitment to protect and maintain its obligation to those customers as a priority.

Other Utility Objectives: Membership in an RTO is a new arena with possible unknown issues still to be addressed. It is important to UMPA, that as negotiations continue with SPP, WAPA does not expand its interests or become conflicted in meeting other utility objectives not within its defined and regulatory authority.

UMPA appreciates the opportunity to comment on WAPA's recommendation to pursue final negotiations regarding CRSP membership in SPP.

Respectfully submitted,



Scott Lynsky, Operations Manager
Utah Municipal Power Agency